

Exhibit 1



Private and Confidential

FAO: Roblox Copyright Agent
Roblox Corporation
970 Park Place
Suite 100
San Mateo
CA 94403

By email only: copyright_agent@roblox.com

05 January 2024

Our ref: MK7621/1400218/3/4156-8023-9950.1

NOTIFICATION PURSUANT TO THE DIGITAL MILLENNIUM COPYRIGHT ACT 1998 (DMCA)

Dear Sirs

Our Client: Christopher Boomer
RE: DMCA Notification

As you will be aware from previous correspondence, we are instructed by Mr Christopher Boomer ('our Client') in relation to the protection of his intellectual property rights arising from games which he has created and owns, and which are hosted on the Roblox platform.

The purpose of this letter is to notify you of content currently active on the Roblox platform which infringes our Client's copyright and to request that the content be removed pursuant to the Digital Millennium Copyright Act 1998 ('DMCA').

Details of the infringement are set out below and a list of the infringing content is enclosed at **Annex 3** to this letter.

Our Client's Games

Our Client is the independent creator and developer of a number of original video games hosted on the Roblox platform, including but not limited to the following:

1. Weight Lifting Simulator 2: <https://www.roblox.com/games/985510407/Weight-Lifting-Simulator-2>
2. Weight Lifting Simulator 3: <https://www.roblox.com/games/2346834658/Content-Deleted>
3. Muscle Legends: <https://www.roblox.com/games/3623096087/Muscle-Legends>

Collectively, we shall refer to the above three games as the "**Weight Lifting Games**". Please note the above is not an exhaustive list of our Client's games.

The Weight Lifting Games are hosted on two groups on Roblox:

1. Flamin' Studios™ - <https://www.roblox.com/groups/2757866/Flamin-Studios#!/about>
2. Scriptbloxian Studios™ - <https://www.roblox.com/groups/4705120/Scriptbloxian-Studios#!/about>

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Copyright

Our client is the sole and independent creator of the artistic works in the Weight Lifting Games including the game visuals and graphics including characters, animations, icons, layout, setting/surroundings, level-design, in-game objects, menus, and menu layout. Our client independently created and/or selected the graphics, frames, movements, textures, shadows and all elements of the game seen on screen. Additionally, he conceived the game “plot” and devised the gameplay including the creation of in-game goals and strategy options and conflicts (in-game problems or obstacles). The Weight Lifting Games are therefore the original and creative expressive work of our Client and therefore amount to copyrightable subject matter.

Our Client owns all rights and privileges associated with his protected works. In particular, our Client holds copyright registrations from the United States Registrar of Copyrights in respect of the Weightlifting Games as follows:

1. US Copyright Registration No.: TX 9-098-098
Title of Work: Weight Lifting Simulator (2)
Date of Registration: 22 March 2022
Date of First Publication: 17 August 2017
2. US Copyright Registration No.: TX 9-098-172
Title of Work: Weight Lifting Simulator (3)
Date of Registration: 22 March 2022
Date of First Publication: 12 September 2018
3. US Copyright Registration No. TX0009104854
Title of Work: Muscle Legends
Date of Registration: 06 April 2022
Date of First Publication: 09 August 2019

Copies of our Client’s copyright certificates are enclosed at **Annex 1**. Our Client also claims copyright in the figurative elements of his trademarks associated with the relevant games, copies of which are attached at **Annex 2**.

Infringing Games on Roblox

Our Client has identified a number of games currently active on the Roblox platform which infringe his intellectual property rights in the Weight Lifting Games as set out above (**the “Infringing Games”**). A list of the Infringing Games is enclosed at **Annex 3**.

Copyright Infringement

Each of the Infringing Games listed at Annex 2 (games 1-15) infringes our Client’s copyright arising from the Weight Lifting Games insofar as those games copy (without our Client’s consent) protected and distinctive constituents of our Client’s video games, including artwork, design aesthetic, layouts, icons, level designs, user interfaces and selection and coordination of game elements, colour and shapes. It is well established that copyright protects such expression in video games. Such copying was not permitted by our Client.

The Infringing Games listed at 2, 3, 6, 7, 10, 11, 12, 13 and 14 of Annex 2 also make use of our client’s figurative “Weight Lifting Simulator” mark to promote the infringing game without our client’s consent. Such use is also an infringement of our client’s copyright subsisting in the mark.

Action Required



The Infringing Games are causing significant damage and loss to our client in that they are receiving significant numbers of visits (and generating significant revenues), which are being redirected from our Client's games.

We trust that, in accordance with Section 512 of the DMCA and Section 6D(i) of the Roblox User Terms, the Infringing Games will be removed from the Roblox platform immediately.

We enclose a signed declaration at **Annex 4** confirming that our client is the copyright owner and that the use of our client's copyright for the above game has not been authorized by our client.

We trust that the enclosed information is sufficient to enable you to take the appropriate remedial action sought by our Client, however should you have any further queries, please do not hesitate to contact us using the contact details provided below.

Legal representative (UK lawyer): Mr Mathew Forde Telephone: +44 (0) 28 90 897610

Email: mathew.forde@lewissilkin.com

Address: Lewis Silkin (NI) LLP, 32-38 Linenhall Street, Belfast, BT2 8BG

Yours faithfully

Lewis Silkin (NI)

Lewis Silkin (N.I.) LLP

Enc. Annexes 1-4

Annex 3: Infringing Games

- 1) <https://www.roblox.com/games/6696718264/Get-Muscles-Simulator>
- 2) <https://www.roblox.com/games/14660936140/Weight-Lifting-Simulator-3>
- 3) <https://www.roblox.com/games/13232803008/Weight-Lifting-Simulator-3>
- 4) <https://www.roblox.com/games/12145132967/Lifting-Legends>
- 5) <https://www.roblox.com/games/5112800284/GYM-Simulator>
- 6) <https://www.roblox.com/games/13058779496/Weight-Lifting-Simulator>
- 7) <https://www.roblox.com/games/9167461444/Update-Weight-lifting-simulator>
- 8) <https://www.roblox.com/games/5872761895/x4-Strength-Workout-Simulator-2>
- 9) <https://www.roblox.com/games/14847160179/Workout-simulator-3>
- 10) <https://www.roblox.com/games/13331449199/Weight-Lifting-Simulator>
- 11) <https://www.roblox.com/games/10792003571/Weight-Lifting-Simulator-4>
- 12) <https://www.roblox.com/games/11681307681/Gabs-Weight-Lifting-Simulator>
- 13) <https://www.roblox.com/games/12481994191/x2-Strength-Weight-Lifting-Simulator-3>
- 14) <https://www.roblox.com/games/6377199042/Weight-Lifting-Simulator-3>
- 15) <https://www.roblox.com/games/8492101088/Training-Simulator>